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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

JAMIE JOE DULUS,

Defendant.

Case No: 2:17-mj-839-CWH

**STIPULATION**  
**FOR PROTECTIVE ORDER**

IT IS HEREBY STIPULATED AND AGREED, by and between Steven W. Myhre, Acting United States Attorney, and Elham Roohani, Assistant United States Attorney, counsel for the United States of America, and Jack E. Buchanan, Esq. counsel for the Defendant JAMIE JOE DULUS, that a Protective Order regarding all discovery in the above captioned case be entered by the Court to protect the privacy of the Defendant and the victims in this case.

DATED this 5th day of September, 2017.

STEVEN W. MYHRE,  
Acting United States Attorney

By: /s/ Elham Roohani  
ELHAM ROOHANI

Assistant United States Attorney

JACK E. BUCHANAN, ESQ.

By: /s/ Jack E. Buchanan  
JACK E. BUCHANAN, ESQ.

Counsel for the Defendant

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Defendant.

**PROTECTIVE ORDER**  
**REGARDING DISCOVERY**

1. Grants a Protective Order to limit disclosure to the public, or any third party not directly related to this litigation, information/documents received pursuant to the order, relating to discovery in *United States v. Jamie Joe Dulus*, No. 2:17-mj-839-CWH (hereinafter referred to as the “protected information”).
2. Further orders that without leave of Court, the parties to this matter, defined herein for the matters of this protective order as the Government, and counsel for the defendant, shall not:
  - a. make copies for, or allow copies of any kind to be made by any other person of the protected information;
  - b. permit dissemination of the protected information at the Nevada Southern Detention Center jail facility, or any other detention facility where the defendant is housed; allow any other person to read the protected information, or reveal orally or in writing any of the protected information to a non-party to this litigation; and

1 c. use of the protective information for any other purpose other than preparing to  
2 defend against the charges in this indictment or any further superseding indictment  
3 arising out of this case; and

4 3. Further, the Court orders that the parties inform the Court any person to whom  
5 disclosure may be made pursuant to this order of the existence and terms of this Court's  
6 order.

7 4. Finally, the Court orders that upon conclusion of this action, the defendant's attorney  
8 return to the United States, or destroy and certify to government counsel the destruction  
9 of the protected information, within a reasonable time, not to exceed thirty days after  
the last appeal is final.

10 5. This protective order shall not be construed to prevent either party from using the  
11 protected document at trial, should the court deem the protected document admissible.

12 Dated this \_September 7\_\_\_\_, 2017.

13 IT IS SO ORDERED:

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15 \_\_\_\_\_  
16 THE HONORABLE CARL W. HOFFMAN  
United States Magistrate Judge